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ATTORNEYS FOR DEFENDANTS
 JINGIT LLC, JINGIT HOLDINGS, LLC,
 JINGIT FINANCIAL SERVICES, LLC,
 TODD ROOKE, JOE ROGNESS, PHIL
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 OLIVER, SHANNON DAVIS, JUSTIN
 JAMES, CHRIS OHLSEN, DAN
 FRAWLEY, DAVE MOOREHOUSE, II,
 TONY ABENA, CHRIS KARLS, JOHN E.
 FLEMING, AND MUSIC.ME, LLC

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

Indiezone, Inc., a Delaware corporation, and
 EoBuy, Limited an Irish private limited company,

Plaintiffs,

vs.

Todd Rooke, Joe Rogness, Phil Hazel, Sam
 Ashkar, Holly Oliver and U.S. Bank, collectively
 the ***RICO Defendants***;

Jingit LLC, Jingit Holdings, LLC, Jingit Financial
 Services LLC, Music.Me, LLC, Tony Abena, John
 E. Fleming, Dan Frawley, Dave Moorehouse II,

Case No. 3:13-cv-04280 (VC)

**JINGIT DEFENDANTS' EXHIBIT
 LIST AND WITNESS DISCLOSURE**

Chris Ohlsen, Justin James, Shannon Davis, Chris Karls in their capacities as officers, agents and/or employees of Jingit LLC, ***Defendants in Negligence, and Aiding/Abetting***;

Wal-Mart, General Electric, Target, DOE(s) and ROE(s) 1 through 10, ***Defendants in Negligence Secondary-Vicarious Infringement***,

Defendants.

Pursuant to the Court's Order of June 6, 2014 (ECF 113), Defendants Jingit LLC; Jingit Holdings, LLC; Jingit Financial Services, LLC; Todd Rooke; Joe Rogness; Phil Hazel; Sam Ashkar, Holly Oliver; Shannon Davis; Justin James; Chris Ohlsen; Dan Frawley; Dave Moorehouse, II; Tony Abena; Chris Karls; John E. Fleming; and Music.Me, LLC (collectively "Jingit Defendants"), identify the following exhibits that may be used in the evidentiary hearing ordered on their motion for sanctions in this matter.

EX. NO.	ECF NO.	DESCRIPTION
1	30	Declaration of Brian Walker in Support of Defendants Rooke and Rogness to Compel Arbitration With Indiezone, Inc., Dismiss Plaintiff EoBuy, Limited and Motion of Remaining Defendants to Stay All Remaining Proceedings confirming dissolved status of EoBuy Limited and lack of capacity to sue under Irish law.
	30-1	Exhibit A – Company Details of EoBuy Limited from the Irish Companies Registration Office (CRO) showing dissolved status and list of EoBuy Limited's submissions to CRO.
	30-2	Exhibit B – Section 12(3) of the Irish Companies Amendment Act 1982 and the amending legislation, Section 46 of the Companies Amendment No. 2 Act 1999, regarding how companies are struck off the register for failure to file returns.
2	54-1	Declaration of Conor Fennelly in Opposition of the Motions to Compel Arbitration Dismiss or to Stay containing representations regarding the purported intentional dissolution of EoBuy Limited and transfer of its assets to Amdex, Pte. and then eoBuy Ventures Limited.
3	57-1	Declaration of Douglas R. Dollinger in Support of the Motion to Amend the Summons and Complaint and in the Alternative for Permis[s]ive Joinder of Parties Fed. R. Civ. P. 15(a) & 20(a) seeking to add eoBuy Ventures Limited as a plaintiff and containing representations regarding the purported intentional dissolution of EoBuy Limited, transfer of its assets to Amdex, Pte. and then eoBuy Ventures Limited, and that eoBuy

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		Ventures Limited has held the assets and did business as “eoBuy” since August 2008.
4	61	Supplemental Declaration of Brian Walker in Support of Defendants’ Motion to Compel Arbitration With Indiezone, Inc., Dismiss Plaintiff EoBuy, Limited and Stay Remaining Proceedings [] and Defendants’ Opposition to Plaintiff Motion to Amend confirming the non-existence of eoBuy Ventures Limited.
	61-1	Exhibit A – February 26, 2014 screen shots showing no results for searches for a company or business name containing the terms “eoBuy Ventures Limited” or “eoBuy Ventures” in the CRO database.
	61-2	Exhibit B – February 28, 2014 screen shot showing two search results (“EoBuy Limited” and the trade name “eobuy”) for a search for a company or business name containing the term “eoBuy” in the CRO database.
	61-3	Exhibit C – February 21, 2014 Certificate of Registration and February 18, 2014 Registration of Business Name “eobuy” filed by Conor Fennelly on behalf of Laraghcon Chauffeur Drive Limited.
5	84-3	Supplemental Declaration of Conor Fennelly in Opposition of the Motions to Compel Arbitration Dismiss or to Stay and the Motion to Amend the Complaint containing representations regarding the purported intentional dissolution of EoBuy Limited, transfer of its assets to its holding company Amdex, Pte. and then eoBuy Ventures Limited, failed filing of eoBuy Venture Limited, review of corporate filings, and that eoBuy Ventures Limited has held the assets and did business as “eoBuy” since August 2008.
	84-4	Exhibit A – Combined Company Register of eoBuy Licencing Limited, Register of Directors, Register of Secretaries and screenshot of Company Details page.
6	90-1	Declaration of Douglas R. Dollinger [] for Enlargement of Time to Reply or Renew Plaintiffs’ Response to the Motions to Compel Arbitration, Dismiss or to Stay the Proceedings and in Support of its Second Motion to Amend, Correct or Supplement its Complaint representing that the name eoBuy Ventures Ltd. was rejected by the Irish Registrar, the alternative name issued was eoBuy Licensing Ltd. and that eoBuy Ltd.’s holding corporation Amdex, Pte held eoBuy Limited’s IP and licenses before transferring them into eoBuy Licensing Limited.
7	95	Second Supplemental Declaration of Brian Walker in Support of Defendants’ Motion to Compel Arbitration with Indiezone, Inc., Dismiss Plaintiff EoBuy, Limited and Stay Remaining Proceedings and Defendants’ Opposition to Plaintiffs’ Motion to Amend showing that Mr. Fennelly and Mr. Dollinger’s representations regarding the intentional

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		dissolution of EoBuy, Limited and purported existence of eoBuy Licensing Limited prior to 2014 are incorrect.
	95-1	Exhibit A – April 4, 2008 official CRO Gazette showing that eoBuy Limited was involuntarily removed from the register for failure to comply with provisions of the Companies Act.
	95-2	Exhibit B – February 6, 2014 Notice of Resolution filed by Conor Fennelly changing the name of Laraghcon Chauffeur Drive Limited to “eoBuy Licensing Limited”
	95-3	Exhibit C – List of submissions to the CRO for company no. 459923 (Laraghcon Chauffeur Drive Limited/eoBuy Licensing Limited)
	95-4	Exhibit D – Certificate of Incorporation on change of name showing that the company name Laraghcon Chauffeur Drive Limited was changed to EoBuy Licencing Limited on March 13, 2014.
	95-5	Exhibit E – Laraghcon Chauffeur Drive Limited’s original application to incorporate a company submitted to the CRO on July 14, 2008, and Certificate of Incorporation issued July 15, 2008. Identifies its business as “Taxi Hire, Limo Hire, Internet Bookings.”
	95-6	Exhibit F – Laraghcon Chauffeur Drive Limited’s originally filed Memorandum of Association and Articles of Association from July 15, 2008, showing its business as “taxi hire, limo hire and internet bookings and any other related activities thereon” and one member (Ciaran Byrne) holding 100 shares.
	95-7	Exhibit G – Annual returns filed for Laraghcon Chauffeur Drive Limited from 2009 to 2014 covering financial years 2008 to 2013, showing each annual return from 2009 to 2013 as filed and signed by director Ciaran Byrne and secretary Teresa Byrne and the only shareholder as Ciaran Byrne holding 100 ordinary shares. The 2014 annual return was filed on March 14, 2014 and signed by John and Conor Fennelly.
	95-8	Exhibit H – February 6, 2014 filing by Conor Fennelly terminating the directorships of Ciaran and Michael Byrne and secretary Teresa Byrne for Laraghcon Chauffeur Drive Limited and making himself director and secretary.
	95-9	Exhibit I – Laraghcon Chauffeur Drive Limited’s Directors’ Reports and Financial Statements and abridged Reports and Statements filed with the CRO between 2010 to 2012 covering financial years 2008 to July 31, 2012, and Eobuy Licencing Limited’s Directors’ Report and Financial Statements for the year ending July 31, 2013. The registered auditors for

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		the 2011 and 2012 Reports and Statements represent that Laraghcon “did not trade since incorporation,” show 100 ordinary shares issued by the company, and Ciaran and Michael Byrne as directors and Teresa Byrne as secretary.
	95-10	Exhibit J – Notice of Resolution to alter the memorandum and articles of association of Laraghcon Chauffeur Limited and Amended Memorandum and Articles of Association for Laraghcon Chauffeur Limited filed on February 6, 2014 by Conor Fennelly changing the objective of the company from “taxi hire, limo hire and internet bookings” to “software development.”
	95-11	Exhibit K – Memorandum of Association and Articles of Association of eoBuy Licencing Limited (formerly Laraghcon Chauffeur Limited) filed on February 6, 2014 by Conor Fennelly showing Conor Fennelly as holding 100 ordinary shares.
	95-12	Exhibit L – Section 242 of the Irish Companies Act 1990 prohibiting the furnishing of false information to the CRO.
8	N/A	List of Submissions and copies of all Submissions filed with the CRO for eoBuy Limited showing directors, shareholders, annual returns, financial statements and other corporate filings.
9	N/A	June 5, 2014, Hearing Transcript on Defendants’ Motions to Compel Arbitration With Indiezone, Inc., Dismiss Plaintiff EoBuy, Limited, Stay Litigation for Remaining Defendants and for Sanctions, and Plaintiffs’ Motions to Amend
10	N/A	March 10, 2009 email from Conor Fennelly to Siobhan Fennelly and copying Todd Rooke, questioning and disputing eoBuy Limited’s dissolved status with the CRO.
11	N/A	March 27, 2009 email from Samuel Angus at Fenwick & West to Jack S. Yeh at Loeb & Loeb, David S. Schaefer, Jim Caparro and Stirling McIlwaine (all for Creative Partners Digital), copying Conor Fennelly, Todd Rooke and Jacob McQuown, attaching clean and marked drafts of a Warrant to Purchase “B” Ordinary Shares of EoBuy Limited in favor of Creative Partners Digital, with attachments.

The Jingit Defendants also disclose the following witness who may be called in-person at the evidentiary hearing:

NAME	SUBJECT OF POTENTIAL TESTIMONY
Brian Walker	The investigation into the corporate status, history and filings with the Irish Companies Registration Office (CRO) for EoBuy, Limited, EoBuy Ventures Limited, EoBuy Licensing Limited and "EoBuy"; corporate filing requirements for the CRO; Irish corporation law, including but not limited to the standards under the Irish Companies Act and amending legislation.

The Jingit Defendants reserve the right to add additional exhibits to respond or rebut any testimony or evidence offered by Plaintiffs or for any other reason.

Dated: July 17, 2014

**MASLON EDELMAN BORMAN & BRAND,
LLP**

By: /s/ Keiko L. Sugisaka
Keiko L. Sugisaka (MN Bar No. 0266152)
(admitted *Pro hac vice*)

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OHLSEN, DAN FRAWLEY, DAVE
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